

### REMARKS

This is in response to the Final Office Action dated October 6, 2004. Claims 1 to 20 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 1-10, 19 and 20 have been rejected under 35 U.S.C. 102(e) as being anticipated by Gudjonsson et al., U.S. Patent No. 6,564,261. The Examiner stated essentially that Gudjonsson teaches all the claimed limitations of claims 1-10, 19 and 20.

Under 35 U.S.C. 102, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the claim. See MPEP §2131. It is respectfully submitted that at the very minimum, Gudjonsson is legally deficient to establish a *prima facie* case of anticipation of claims 1 and 19.

Claim 1 claims, *inter alia*, "capturing user data from the user; displaying an abstract graphical display of the environment to the user; and displaying a user representation within the abstract graphical display incorporating the user data to the user." Claim 19 claims, *inter alia*, "a processor for receiving information from a plurality of users and presenting said information in a graphical form to the plurality of users, wherein the plurality of users communicate user data to the processor for incorporation in the graphical environment as user proxies, the user data is abstracted to provide the user proxy comprising an abstract graphical cue of a first parameter of the user data, wherein the abstract graphical cue moves through the graphical environment according to a second parameter of the user data to provide a second abstract graphical cue."

Gudjonsson teaches a contact list of users (see Figure 8 and col. 11, line 43 to col. 12, line 18) and methods for establishing a communication session between the users, wherein the communication session may be a text chat session, a voice chat session, or web conference (see col. 3, lines 13-18). Gudjonsson fails to teach “capturing user data from the user; displaying an abstract graphical display of the environment to the user; and displaying a user representation within the abstract graphical display incorporating the user data to the user” as claimed in claim 1. Gudjonsson teaches that lists of other users are displayed to a user (see col. 11, lines 44-64). Gudjonsson does not teach that a user’s own data is displayed within an abstract graphical environment to the user; “displaying a user representation within the abstract graphical display incorporating the user data to the user”, as claimed in claim 1. Displaying a list of other users does not teach, “displaying a user representation within the abstract graphical display incorporating the user data to the user” as claimed in claim 1. Therefore, Gudjonsson does not teach every limitation of claim 1.

Referring to claim 19, Gudjonsson teaches a contact list including information such as addresses and IDs (see Figure 8 and col. 11, line 43 to col. 12, line 18). Gudjonsson does not teach user data “abstracted to provide the user proxy comprising an abstract graphical cue of a first parameter of the user data, wherein the abstract graphical cue moves through the graphical environment according to a second parameter of the user data to provide a second abstract graphical cue” as claimed in claim 19. Gudjonsson teaches a contact list including literal user information. The user information is not abstract. Therefore, Gudjonsson does not teach user data “abstracted to provide the user proxy comprising an abstract graphical cue,” essentially as claimed in claim 19. Further, with respect to Figures 1-6 of Gudjonsson, these illustrations are used for describing the invention. However, nowhere does Gudjonsson teach that Figures 1-6

are presented in graphical form to a user, essentially as claimed in claim 19. Therefore, Gudjonsson fails to teach all the limitations of claim 19.

Claims 2-10 depend from claim 1. Claim 20 depends from claim 19. The dependent claims are believed to be allowable to at least the reasons given for claims 1 and 19, respectively. The Examiner's reconsideration of the rejection is respectfully requested.

Claims 11-18 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Gudjonsson in view of Scott et al. (U.S. Patent No. 5,638,504). The Examiner stated essentially that the combined teachings of Gudjonsson and Scott teach or suggest all the limitations of claims 11-18.

Multiple cited prior art references must suggest the desirability of being combined, and the references must be viewed without the benefit of hindsight afforded by the disclosure. The Examiner has chosen a multitude of references, apparently in hindsight, to reject claim 11, however, each reference relates to entirely different arts, for example, Gudjonsson methods for establishing a communication session between the users, wherein the communication session may be a text chat session, a voice chat session, or web conference (see col. 3, lines 13-18), and Scott teaches a system for providing system level support for document processing (see Abstract). Given the different fields of the references (e.g., communications and document processing), and the lack of a suggestion or motivation to combine the references, these references are not believed to be combinable. Therefore, reconsideration of the rejection is respectfully requested.

Claim 11 is believed to be allowable for additional reasons.

Claim 11 recites, *inter alia*, “displaying an abstract graphical display of the social proxy for a virtual environment and facilitating user interaction, wherein the abstract graphical display is a geometric shape.”

Gudjonsson teaches a contact list (see Figure 8 and col. 11, line 43 to col. 12, line 18). Gudjonsson does not teach or suggest, “displaying an abstract graphical display of the social proxy for a virtual environment and facilitating user interaction, wherein the abstract graphical display is a geometric shape” as claimed in claim 11. The contact list of Gudjonsson is not analogous to a social proxy for a virtual environment, much less a social proxy having a geometric shape. The contact list of Gudjonsson is a one-dimensional directory of users. Gudjonsson merely displays user data individually on a user-by-user basis. Gudjonsson does not teach or suggest a geometric shape representation for a virtual environment. Nowhere does Gudjonsson teach or suggest that a social proxy for a virtual environment is a geometric shape. Therefore, Gudjonsson fails to teach all the limitations of claim 11.

Scott teaches a system for providing system level support for document processing (see Abstract). Scott teaches a proxy for document processing, appearing as an illustration of a page (see Figure 2). Scott does not teach or suggest a social proxy for a virtual environment having a geometric shape, essentially as claimed in claim 11. The proxy of Scott represents document management functions. Document management functions as taught by Scott are not a representation of a virtual environment. Thus, Scott fails to teach or suggest a geometric shape representation for a virtual environment. Therefore, Scott fails to cure the deficiencies of Gudjonsson.


Neither Gudjonsson nor Scott, either together or in combination teach or suggest that a social proxy for a virtual environment is a shape, much less “displaying an abstract graphical

display of the social proxy for a virtual environment and facilitating user interaction, wherein the abstract graphical display is a geometric shape” as claimed in claim 11.

Claims 12-18 depend from claim 11. The dependent claims are believed to be allowable for at least the reasons given for claim 11. Reconsideration of the rejection is respectfully requested.

Accordingly, the application, including claims 1-20, is believed to be allowable for at least the reasons stated. The Examiner’s withdrawal of the rejections is respectfully requested. For the forgoing reasons, the application is believed to be in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

  
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